MARILYN LAWRENCE 5362 W.OLYMPIC BLVD. #1 LOS ANGELES, CALIFORNIA 90036 TELEPHONE: (323) 216 - 4619 E-MAIL ADDRESS MARILYNEVIE@NETZERO.COM (PRO SE) CREDITOR /PLANTIFF

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re.

RESIDENTRIAL, CAPITAL, LLC, el al.,

Case No. 12-12020(MG)

Debtors.

Chapter 11

**Jointly Administered** 

**OBJECTIONS:** TO RESCAP LIQUIDATING TRUST'S OMINIBUS MOTION TO ENFORCE INJUNCTIVE OF PLAN AND CONFIRMATION ORDER

KRAMER LEMIN NAFTALIS &FRANKEL LLP

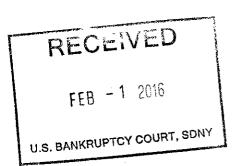
Kenneth H. Eckstein Douglas H. Mammal Joseph A. Shifer 1177 Aveenue of the Americas New York, New York 10036 Telephone: (212) 715-9100 Facsimile: (212) 8000

Counsel for the ResCap Liquidating Trust OJBECTIONS: TO RESCAP LIQUIDATING TRUST'S OMNIBUS MOTION TO

ENFORCE INJUNCTIVE PROVISIONS OF PLAN AND CONFIRMATION ORDER

HEARING SCHEDULED: On February 19, 2016 At 10:00

- A hearing is before the HONORABLE MARTIN GLENN, United States Bankruptcy Judge, One Bowling Green, New York, 10004,
- MARILYN LAWRENCE Pro Se, Creditor/Plaintiff is not present in the chamber of the HONORABLE MARTIN GLENN JUDGE, & Counsel ResCap.



## TO THE HONORABLE MARTIN GLENN, UNTIED STATES BANKRUPCY JUDGE

### **OBJECTIONS**

MARILYN LAWRENCE (Creditor) Pro Se. Case No. 12-12020-mg Live at 5362 W. Olympic Blvd. # 1 Los Angeles, California 90036

# **EXECUTIVE TRUSTEE SERVICES LLC**

Debtor(s) party to Ligtigation LLC, Lawrence v. Sadek, el al., Case No. 12-01372 U.S. District court for the Central District of California.

MARILYN LAWRENCE (CREDITOR/PLAINTIFF)

CONTEST: ResCap Liquidating Trust's Omnibus Motion to Enforce Injunction provisions of plan and Confirmation Order

#### **OBJECTIONS**

- 1. COUNSEL MR. SHIFER STATED THAT MARILYN LAWRENCE FAILED TO FILED A TIMELY PROOF OF CLAIM.
- 2. Creditor / Plaintiff Marilyn Lawrence, never received notice prior to June 31, 2015 ONLY after the filing dates passed, I heard from counsel Joseph A. Shifer concerning deadlines to file a proof of claim Marilyn Lawrence Creditor had no Knowledge of the decision that was made in August 29, 2012 that THE LIQUIDATING TRUST has made a GOOD FAITH DETERMNATION

that this action asserts monetary claims against the Debtors because you (Marilyn Lawrence creditors). assert, among

other things, damaged for:

- A. Breach of Fiduciary Duty
- **B.** Fraud
- C. Usury
  EXHIBIT A. LETTER FROM MR. JOSEPH SHIFER DATED
  JUNE 31, 2015

## 3. EXHIBIT B. AFFIDAVIT OF SERVICE

Melissa Loomis employed by Kurtzman Carson Consultants

LLC. Served via First Class Mail on June 4, 2012 a master service

meetings of Creditors, and Deadlines.

MARILYN LAWRENCE never received this notice.

4. Exhibit C.

CREDITOR MATRIX MAILING LIST SERVED VIA FIRST CLASS MAIL

BY Melissa Loomis. Mailed to wrong mailing address for Marilyn Lawrence (creditor/ plaintiff).

5. (EXHIBIT D). QUARTERLY BANKRUPYCY REPORT FOR ETS.

The only other possibility that Marilyn Lawrence (CREDITOR)

could have come to know of this Action would have been through the pending Case No. 2-12 cv -01372 cas-cw in UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA.

5. A. The Attorneys for the Defendant

EXECUTIVE TRUSTEE SERVICES, LLC dba ETS SERVICES, LLC

STATED In their Quarterly report in July 29, 2015 that ETA is in an active Chapter 11 Bankruptcy case before the United States

Bankruptcy court, Southern District of New York, in a jointly administered case, titled, In re Residential Capital, LLC et al., assigned case number 12-12020(MG).

5.b. They never made known to the

MARILYN LAWRENCE(creditor) nor to The Honorable

CHRISTINA A. SYNDER the decision that was made back in

August 29, 2012 or before that THE LIQUIDATAING TRUST HAS

MADE A GOOD FAITH DETERMINATION THAT MARILYN

LAWRENCE CASE ASSERTS MONETARY DAMAGES FOR

A.FRAUD

B.USURY

C. BREACH OF FIDUCIARY DUTY

- 5.c. ETA ATTORNEY'S REPORTED NO DECISIONS MADE BY
  THE FEDERAL COURTS AND THEY STATED THE ABOVE AND
  NO HEARING NECESSARY
  NO HEARING NECESSARY please see EXHIBIT
- 6. (EXHIBIT E). CREDITOR MARILYN LAWRENCE QUARTERLY BANKRUPTCY REPORT FILED OCTOBER 16, 2015

  Marilyn Lawrence tried to communicate with Mr. Joseph A

  Shifer but with no success. On learning of these facts please find my Quarterly report made to the HONORABLE CHRISTINA

  A. SNYDER UNITED STATES DISTRICT JUDGE OF THE DISTRICT OF CALIFORNIA.
- 7. (EXHIBIT) F MARILYN LAWRENCE (CREDITOR) PROOF OF CLAIM CREDITOR MARILYN LAWRENCE SUBMMITED THREE PROOFS OF CLAIMS. THIS ONE RECEIVED AUG 18, 2015

TO THE HONORABLE MARTIN GLENN UNITED STATES

BANKRUPTCY JUDGE OF SOUTHERN DISTRICT OF NEW YORK

CONCLUSION

- 1. MARILYN LAWRENCE (CREDITOR) RECOGNIZE WHAT HAS BEEN TAKEN AWAY WILL NOT BE RETURNED my home. BUT WHAT WAS MADE KNOWN BACK IN 2012 Was not made known to Marilyn Lawrence until 2015 by sending mail to the wrong address there is so many issues and I know that they cannot all be address. THE TRUTH I HAVE PRESENTED WITH PROOF. MAY YOU CONSIDER AND NOT ALLOW RESCAP LIQUIDATING TRUST' NOT BE GRANTED THIS MOTION TO DENIED MARILYN LAWRENCE CLAIM.
  - 2. MAY YOU THE HONORABLE MARTIN GLENN CONTINUE TO ENFORCE THE RIGHT'S OF MARILYN LAWRENCE WITH THE DECISION THAT WAS MADE THAT THE LIQUIDATING



TRUST MADE IN GOOD FAITH THAT THIS ACTION ASSERTS

MONETARY CLAIMS AGAINST THE DEBTORS BECAUSE

MARILYN LAWRENCE ASSERTS, AMONG THINGS, DAMAGES

FOR WHAT HAS BEEN STATED, IN PARAGRAPH 4.

DATE-1-28-2016

MARILYN LAWRENCE Manly Lawrence